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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SAMANTHA ALEXANDRIA HARPER-  
ALVAREZ, an individual;

Plaintiff,

v.

GEICO ADVANTAGE INSURANCE  
COMPANY; DOES 1-X, and ROE  
CORPORATIONS I - X, inclusive,

Defendants.

CASE NO. 2:25-CV-00160-RFB-MDC

**STIPULATION AND ORDER TO  
CONTINUE DEADLINES**

**[FIRST REQUEST]**

COME NOW the parties, by and through their respective counsel of record, and hereby stipulate to extend the current deadlines by ninety days to conduct the necessary discovery in this matter.

The following discovery has been completed:

1. Plaintiff disclosed initial documents and witnesses pursuant to FRCP 16.1.
2. Defendant disclosed initial documents and witnesses pursuant to FRCP 16.1.
3. Defendant served written discovery upon Plaintiff.
4. Plaintiff responded to Defendant's written discovery requests.
5. Defendant has noticed the deposition of Plaintiff.
6. Plaintiff has served written discovery on Defendant.

1 An extension of the discovery deadlines in this case is sought despite the parties' earnest  
2 efforts in proceeding in discovery. There have been scheduling conflicts and difficulties  
3 completing the remaining discovery, pursuant to the current deadlines, as specified below:

- 4 1. Plaintiff's Deposition.
- 5 2. Defendant's FRCP 30(b)(6) Deposition.
- 6 3. Plaintiff's Medical Examination, pursuant to FRCP 35.
- 7 4. Plaintiff's Designation of its initial and rebuttal expert witnesses.
- 8 5. Defendants' Designation of its initial and rebuttal expert witnesses.
- 9 6. Depositions of designated retained and non-retained expert witnesses.
- 10 7. Serve subpoenas and supplemental written discovery as new information is  
11 obtained.
- 12 8. Other discovery permitted by the Rules of Civil Procedure or orders of this Court.

13 Also adding to the need to extend deadlines is that Plaintiff's deposition is presently  
14 scheduled for July 2, 2025 due to parties' availability. This is a mere few weeks before the  
15 present close of discovery and falls after the expert disclosure deadlines. Additionally, Plaintiff is  
16 in the process of noticing the deposition of GEICO's FRCP 30(b)(6) Deposition. Both of these  
17 depositions will be crucial to this claim and expert reports. Additionally, depositions still need to  
18 be taken, to include both Plaintiff's and Defendant's expert witnesses and presumably a medical  
19 examination of Plaintiff pursuant to FRCP 35.

20 As such, the parties have found that this matter will need extended deadlines to  
21 reasonably allow for discovery to consider the schedules of parties' depositions, Plaintiff's  
22 medical examination(s), expert disclosures, and expert witness depositions. The parties are  
23 needing to extend deadlines by at least an additional ninety (90) days to allow sufficient time to  
24 complete the needed discovery, which also causes a domino effect to the deadlines to Amending  
25 the Pleadings and Adding Parties, Dispositive Motions, and Pre-Trial Order. Furthermore, the  
26  
27  
28

stipulation for extension of discovery is being made before the cut-off period of July 7, 2025.

The proposed extended schedule is as follows:

Event	Previous Date	Proposed Date
Close of Discovery:	July 28, 2025	October 27, 2025
Amend Pleadings/Add Parties:	April 29, 2025	CLOSED
Initial Expert Disclosures:	May 29, 2025	August 27, 2025
Rebuttal Expert Disclosures:	June 30, 2025	September 29, 2025
Dispositive Motions:	August 27, 2025	November 26, 2025
Joint Pretrial Order:	September 26, 2025	December 30, 2025

**DATED** May 16, 2025  
**GINA CORENA & ASSOCIATES**

/s/ Jenna Pyle  
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**DATED** May 16, 2025  
**ROGERS, MASTRANGELO, CARVALHO  
 & MITCHELL**

/s/ Jonathan Carlson  
 Jonathan Carlson  
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*Attorneys for Geico Advantage Insurance  
 Company*

**IT IS SO ORDERED.**

  
 \_\_\_\_\_  
 Hon. Maximiliano D. Couvillier III  
 United States Magistrate Judge  
 Dated: 5/20/2025

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them must be included in the joint pretrial order.